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Attorneys for Defendants Oregon Department of Corrections, Oregon State Board Of Nursing,
Coffey, Davis, Digiulio, Kelly, Magee, Mccrae, Peters, Poole; Premo and Ridderbusch

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

DENNIS GINES,

Plaintiff,

v.

OREGON DEPARTMENT OF
CORRECTIONS (ODOC), a political
subdivision in charge of the Oregon State
Penitentiary (OSP); COLETTE PETERS,
Director, ODOC; C. DIGIULIO, Medical
Administrator, ODOC; BRANDON KELLY,
Superintendent, OSP; JEFF PREMO,
Superintendent, OSP; KEITH DAVIS, OSP
Food Services Manager; RICHARD
RIDDERBUSCH, OSP Assistant Food
Services Manager; CARRIE COFFEY, OSP
Health Services Manager; JULIE McCRAE,
OSP Health Services Nurse; BRENDA
MAGEE, OSP Health Services Nurse
Manager; OREGON STATE BOARD OF
NURSING (OSBN) a political subdivision of
the executive branch of the State of Oregon;
ROBERTA POOLE, OSBN Complaint Intake
Coordinator,

Defendants.

Case No. 6:17-cv-00841-SI

SECOND MOTION FOR EXTENSION OF
TIME FOR FILING RESPONSE AND
REPLY

CERTIFICATE OF CONFERRAL

Pursuant to L.R. 7-1(a)(1)(C), counsel for Defendants certifies that Plaintiff is not represented by counsel, and presently is in the custody of the Oregon Department of Corrections (“ODOC”), and is incarcerated at the Oregon State Penitentiary (“OSP”) located in Salem, Oregon. Accordingly, the parties are unable to resolve this dispute without Court involvement.

MOTION

The current deadline for Defendants’ *Reply in Support of Summary Judgment* [Def’s MSJ at #49; Pltf’s Response at #64] and for Defendants’ Response to Plaintiff’s *Motion for Leave to File Amended Complaint* [Pltf’s Motn at #63] is **January 18, 2019**. [ECF No. 67].

Defendants request an additional extension of **ten (10) days to Monday, January 28, 2019** to file responsive briefing. Undersigned counsel was unexpectedly required for reserve duty (Oregon Air National Guard) for two days this week and continuing to Tuesday and Wednesday (Jan 22-23, 2019) of next week. Apologies to the Court for the inconvenience and to Plaintiff for the delay. This motion is supported by the Declaration of Counsel filed concurrently, and is not brought for purposes of delay or any other improper purpose.

DATED January 18, 2019.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Robert E. Sullivan

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Peters, Poole; Premo and Ridderbusch

CERTIFICATE OF SERVICE

I certify that on January 18, 2019, I served the foregoing SECOND MOTION FOR EXTENSION OF TIME FOR FILING RESPONSE AND REPLY upon the parties hereto by the method indicated below, and addressed to the following:

DENNIS GINES

SID #12019691

Oregon State Penitentiary

2605 State Street

Salem, OR 97310-0505

Plaintiff Pro Se

 HAND DELIVERY

 X MAIL DELIVERY

 OVERNIGHT MAIL

 TELECOPY (FAX)

 E-MAIL

 E-SERVE

s/ Robert E. Sullivan

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